

LITE DEPALMA GREENBERG, LLC

Joseph J. DePalma

Jeremy Nash

570 Broad Street, Suite 1201

Newark, New Jersey 07102

Telephone: (973) 623-3000

Facsimile: (973) 623-0858

jdepalma@litedepalma.com

jnash@litedepalma.com

Attorneys for Plaintiff and the Classes

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

JOSE MENDEZ, Individually and On Behalf Of All Others Similarly Situated,	:	Civil Action No. 11-6537(JLL)(JAD)
<i>Plaintiff,</i>	:	
vs.	:	NOTICE OF MOTION FOR CLASS CERTIFICATION
AVIS BUDGET GROUP, INC. d/b/a BUDGET RENT A CAR SYSTEM, INC. and AVIS RENT A CAR SYSTEM, LLC; and HIGHWAY TOLL ADMINISTRATION, LLC,	:	
<i>Defendants.</i>	:	

PLEASE TAKE NOTICE that on January 3, 2017, or as soon thereafter as counsel may be heard, plaintiff Jose Mendez will move before the Honorable Jose L. Linares, U.S.D.J., at the United States District Court, Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, NJ 07101 (1) for

certification of a Nationwide Class, a Florida Subclass, and a New Jersey Subclass, (2) for the appointment of Plaintiff as representative of the Classes, and (3) for the appointment of the undersigned attorneys and firms as Class Counsel. This motion is supported by a Memorandum of Law in Support of Class Certification, and the Declaration of Jeremy Nash. A proposed form of Order is also submitted herewith.

PLEASE TAKE FURTHER NOTICE that oral argument is requested.

Dated: October 7, 2016

LITE DEPALMA GREENBERG, LLC

/s/ Joseph J. DePalma
Joseph J. DePalma
Jeremy Nash
570 Broad Street, Suite 1201
Newark, New Jersey 07102
Tel: (973) 623-3000
Fax: (973) 623-0858
jdepalma@litedepalma.com
jnash@litedepalma.com

ABBEY SPANIER, LLP
Judith L. Spanier
Nancy Kaboolian
212 East 39th Street
New York, New York 10016
Tel: (212) 889-3700
Fax: (212) 684-5191
jspanier@abbeyspanier.com
nkaboolian@abbeyspanier.com

Attorneys for Plaintiff and the Proposed Classes

CERTIFICATE OF SERVICE

I, Joseph J. DePalma, hereby certify that on Friday, October 7, 2016, I caused a copy of (a) the Notice of Motion; (b) the Memorandum of Law In Support of Plaintiff's Motion; (c) Declaration of Jeremy Nash; (d) Plaintiff's Proposed Form of Order; and (d) this Certificate of Service to be served on all counsel via e-mail.

/s/ Joseph J. DePalma
Joseph J. DePalma